

PUBLIC NOTICE

Marvin Windows of Tennessee, Inc has applied to the Tennessee Department of Environment and Conservation, Division of Air Pollution Control for renewal of their major source (Title V) operating permit subject to the provisions of Tennessee Air Pollution Control Regulations 1200-03-09-.02(11) (Title V Regulations). A major source operating permit is required by both the Federal Clean Air Act and Tennessee's air pollution control regulations. However, it should be noted that this facility has a current major source operating permit.

The applicant is **Marvin Windows of Tennessee, Inc** with a site address of 101 Marvin Road, Ripley, TN 38063. They have applied for renewal of their existing major source (Title V) operating permit for their windows and doors manufacturing operation.

EPA has agreed to treat this draft Part 70 permit as a proposed Part 70 permit and to perform its 45-day review provided by the law concurrently with the public notice period. If any substantive comments are received, EPA's 45-day review period will cease to be performed concurrently with the public notice period. In this case, EPA's 45-day review period will start once the public notice period has been completed and EPA receives notification from the Tennessee Air Pollution Control Division that comments have been received and resolved. The status regarding EPA's 45-day review of these permits and the deadline for submitting a citizen's petition can be found at the following website address:

<https://www.epa.gov/caa-permitting/tennessee-proposed-title-v-permits>

Copies of the application materials and draft permits are available for public inspection during normal business hours at the following locations:

Jackson Environmental Field Office
Division of Air Pollution Control
1625 Hollywood Drive
Jackson, TN 38305

and

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243

Electronic copies of the draft permits are available by accessing the TDEC internet site located at:

<https://www.tn.gov/environment/ppo-public-participation/ppo-public-participation/ppo-air.html>

Questions concerning the source(s) may be addressed to Derek Briggs at (615) 532-0550 or by e-mail at derek.briggs@tn.gov.

Interested parties are invited to review these materials and comment. In addition, a public hearing may be requested at which written or oral presentations may be made. To be considered, written comments or requests for a public hearing must be received no later than 4:30 PM on **June 25, 2023**. To assure that written comments are received and addressed in a timely manner, written comments must be submitted using one of the following methods:

1. **Mail, private carrier, or hand delivery:** Address written comments to Ms. Michelle W. Owenby, Director, Division of Air Pollution Control, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue 15th Floor, Nashville, Tennessee 37243.
2. **E-mail:** Submit electronic comments to air.pollution.control@tn.gov.

A final determination will be made after weighing all relevant comments.

Individuals with disabilities who wish to review information maintained at the above-mentioned depositories should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such review. Such contact may be in person, by writing, telephone, or other means, and should be made no less than ten days prior to the end of the public comment period to allow time to provide such aid or services. Contact the Tennessee Department of Environment and Conservation ADA Coordinator, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue 22nd Floor, Nashville, TN 37243, 1-(866)-253-5827. Hearing impaired callers may use the Tennessee Relay Service, 1-(800)-848-0298.

PROPOSED TITLE V PERMIT STATEMENT (RENEWAL)

Facility Name: Marvin Windows of Tennessee, Inc.
City: Ripley
County: Lauderdale
Date Application Received: April 26, 2021
Date Application Deemed Complete: April 26, 2021
Emission Source Reference No: 49-0068
Permit No.: 579026

INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Title V Operating Permit which is being renewed for this facility. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-03-09-.02(11)(f)1.(v). The primary purpose of the Title V Operating Permit is to consolidate and identify existing state and federal air requirements applicable to ***Marvin Windows of Tennessee, Inc.*** and to provide practical methods for assuring compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit renewal. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

Acronyms

PSD - Prevention of Significant Deterioration
NESHAP - National Emission Standards for Hazardous Air Pollutants
NSPS - New Source Performance Standards
MACT - Maximum Achievable Control Technology
NSR - New Source Review

I. Identification Information

A. Source Description

The facility manufactures custom-made wooden doors and windows. The following sources exist at this facility:

01: Woodworking operation #1 with wood dust collection from saws, molders, jointers, CNC machines, and wood hog with load-out to bins/trucks using cyclones and fabric filters for particulate control	18: Assembly operations (Source K) including glass cleaning, hand painting, primer coating, sealant application, and spray booths
05: Dip tank for applying wood preservatives	19: Gluing operations (Source J) for wooden and fiberglass/wood composite parts
10: Surface coating operation with primer and sealer (display unit) spray	20: Custom color paint line for coating of aluminum extrusions, with curing oven
17: Surface coating with fan coater of linear wood parts (wood bead)	22: Woodworking operation #2 with CNC machines, shapers, saws, disk sanders

B. Facility Classification

1. Attainment or Non-Attainment Area Location

Area is designated as an attainment area for all criteria pollutants.

2. Company is located in a Class II area (this means that the facility is not located within a national park or national wilderness area; see 40 CFR 52.21(e) for complete definition.).

C. Regulatory Status

1. PSD/NSR

This facility *is not* a major source under PSD.

2. Title V Major Source Status by Pollutant

Pollutant	Is the pollutant emitted?	Major Source Status for Pollutant
PM	Yes	No
PM ₁₀	Yes	No
SO ₂	No	No
VOC	Yes	Yes
NO _x	No	No
CO	No	No
Individual HAP	Yes	No
Total HAPs	Yes	No

3. MACT Standards

This facility is an area source for HAPs and is subject to a final NESHAP Standard.

40 CFR 63 subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

4. Program Applicability

Are the following programs applicable to the facility?

PSD (*no*)

NESHAP (*yes*)

NSPS (*no*)

II. Compliance Information

A. Compliance Status

Is the facility currently in compliance with all applicable requirements? *yes*

Are there any applicable requirements that will become effective during the permit term? *no*

III. Other Requirements

A. Emissions Trading

The facility is not involved in an emission trading program.

B. Acid Rain Requirements

This facility is not subject to any requirements in Title IV of the Clean Air Act.

C. Prevention of Accidental Releases

Not Applicable

D. Compliance Assurance Monitoring (40 CFR 64) for Woodworking Operations (Source 01 and Source 22)

IV. Public Participation Procedures

Notification of this draft permit was sent to the following environmental agencies:

1. EPA - Region IV
2. States of Arkansas, Missouri, Mississippi, and Kentucky
3. Memphis-Shelby County APC
4. Jackson EFO

V. Permit History

Title V Operating Permit No. 579026 represents the fourth renewal for this Title V facility. The following changes (modifications) have occurred since the issuance of Title V Permit 548467:

April 5, 2005

Issued Date of Administrative Permit Amendment #1 to Title V Permit 555810

- Cover page was amended to include the date of Administrative Permit Amendment #1 as well as to note change in "Information Relied Upon" section.
- Log 2 of Condition E3-2 (page 17) was amended by changing the last column heading from "Total Facility VOC Emissions..." to "VOC Emissions..." This change was necessary to clarify that records of a 12-month total were required for each source as opposed to the total facility.

April 15, 2005

Date of OP. Flex Notification from company

- Replacing existing fan coating machine (source 17) with another fan coating machine fabricated as a direct replacement. No changes in emissions or operations of this source would occur due to this change. The Division acknowledged and accepted this as the required notification for the change.

June 17, 2005

Date of OP. Flex Notification from company

- Adding a drying rack for wood divider bars that will be installed in the wood dipping area (source 05). No additional emissions will result from the drying rack. This change is necessary due to a new coating that has been developed for application to the bars. The new coating is HAPs free and is slightly lower VOC content. As soon as they initiate the drying rack the old coating will be eliminated in source 17. The end result will be elimination of double coating the divider bars which will lower usage of the coating, fewer emissions and eliminate a HAP containing coating.

January 4, 2006

Date of OP. Flex Notification from company

- Replacing spray booth (source 10) with a new booth of approximately the same size.

July 31, 2006

Issued date of Minor Modification #1 to Title V Permit 555810

- Installing a paint booth (source 20) with electrostatic guns and a curing oven to paint to paint aluminum extrusions with custom colors of Flouropen paints. The painting on this line is intended to allow special response to special customer requests.
- Emissions from this painting system will be VOCs, particulates, and HAPs. The maximum potential to emit (allowable emissions for fee purposes) will increase by 23 tons per year of VOC and 4.0 tons per year of particulate.

January 5, 2007

Date of OP. Flex Notification & Insignificant Activity Designation from company

- Letter from company notifying the Division of a change to use some touchup stains, coatings and fill-stick colors to repair shipping damage that may occur on a new entry door product that is pre-finished in Honduras and assembled in Ripley, TN. VOC Emissions are less than 5 tpy and 1000 lbs of HAPs.

- Also, there will be a limited amount of stain used on special order frames with aluminum clad exteriors; the staining will be done at source 20. No increase in permitted emissions is expected.

March 8, 2007

Letter notifying the Division of a change to stack height of the curing oven and spray booth (source 20). The stack heights will be extended 12 feet with diameters and flows remaining the same. This is being done to eliminate the possibility of odors from these stacks that are close to two air conditioning unit's fresh air intakes entering the building.

March 25, 2008

Date of OP. Flex Notification from company

Adding sheet metal to existing spray booths in assembly operation (source 18). The sheet metal will increase the booth's depth so longer parts can be contained in the booth.

August 21, 2009

Date of OP. Flex Notification from company

- Relocate existing display booth (source 10) approximately 50 feet from its current location and at the same time extend the booth enclosure sides and top and change the materials used in the booth. The materials currently used in this booth will move to source 18.

January 7, 2010

Issued date of Minor Modification #2 to Title V Permit 555810

- The cover page includes the date and brief descriptions of the changes made by Minor Modification #2.
- The Fee Emission Summary Table in Condition E1 has been revised to reflect new allowable emissions totals from the facility.
- Condition E1(2)(c) has been revised to include a reference to Condition E11-2 for purposes of the actual emissions analysis.
- Condition E2(a)(1) has been revised to include references to Conditions E11-1 and E11-3 for semiannual reporting purposes.
- Condition E2(a)(2) has been revised to include a reference to Condition E11-4 for the purpose of reporting visible emission evaluations.
- Conditions E11-1 thru E11-4 have been added for the installation of a new door finishing line (49-0068-21) for the application of sealer and finish.

November 23, 2010

Title V Permit 562099 issued

December 23, 2010

Date of OP. Flex Notification (#1) from company

- Relocate door finishing booth (source 10) The Division acknowledged and accepted this as the required notification for the change (January 12, 2011).

August 23, 2011

Date of OP. Flex Notification (#2) from company

- Install a detect and abort gate system (source 10) to comply with new OSHA regulations on combustible dust. The Division acknowledged and accepted this as the required notification for the change (September 16, 2011).

March 15, 2012

Date of OP. Flex Notification (#3) from company

- Remove the pre-filter from the spray booth (source 10). This change does not affect the allowable PM limit. (March 27, 2012).

December 14, 2012

Issued date of Minor Modification #1 to Title V Permit 562099 (April 2, 2012)

- The permittee's requested addition of the applicability of 40 CFR 63 subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

August 2, 2012

Date of OP. Flex Notification (#4) from company

- Install a detect and abort gate system in the return air duct to comply with new OSHA regulations on combustible dust. The Division acknowledged and accepted this as the required notification for the change (August 14, 2012).

September 19, 2012

Date of OP. Flex Notification (#5) from company

- Relocate Door Finishing Booth (source 21) approximately 450 feet from current location. The Division acknowledged and accepted this as the required notification for the change (October 15, 2012).

July 15, 2014

Issued date of Minor Modification #2 to Title V Permit 562099 (October 29, 2014)

- The permittee's requested replacing 14 small internal dust collectors with one external dust collector. Also the permitted requested that sources 10 and 21 be combined.

April 1, 2015

Issued date of Administrative Amendment #1 to Title V Permit 562099 (April 27, 2015)

- Administrative Amendment #1 is to include minimum pressure drop to Condition E12-2 for Source 22.

December 8, 2021

Date of OP. Flex Notification (#6) from company

- Replacement of aluminum metal saws and punches with new saws, and the addition of a metal dust collection system. The Division acknowledged and accepted this as the required notification for the change (February 23, 2022).

TBD, 2023

Title V Permit 579026 issued

- Conditions A1 through E2 updated to include new standard language. Added Condition E3-14 Insignificant Activities. Added Attachment 3 APC 36 form for emission fee election schedule. Added Attachment 4 Form HHHHHH Annual Notifications of Changes. Added Attachment 5 Source 05 and 10 VOC agreement letter. Responsible Official updated to Jaime Schilling based on letter dated July 28, 2022. Principle Technical Contact and Billing Contact updated to Jay Caldwell based on application dated April 20, 2021. Fixed minor grammatical issues and formatting.

VI. Dates of Public Comment and EPA review periods

Public Participation Important Dates:

EPA concurrent review requested	<u>Yes</u>
Public Notice publication date	<u>May 26, 2023</u>
Public Notice period completion date	<u>June 25, 2023</u>
Public Notice publication comments	<u>TBD</u>
EPA review period completion date	<u>July 10, 2023</u>
EPA review comments	<u>TBD</u>

VII. Summary of Allowable PM and VOC Emissions by Source Number

<u>Source ID</u>	PM – Tons/Year	VOC- Tons/Year
01: Woodworking Operations #1	35.70	
05: Dip Tank for Wood Preservatives		123.00
10: Surface Coating Spray Booths (includes source 21)	4.38	9.92
17: Surface Coating – Fan Coater		4.05
18: Assembly Source K	29.00	29.50
19: Gluing Operations Source J		5.00
20: Paint Booth	4.00	23.00
22: Woodworking Operations #2	4.38	
Total	77.46	194.47

STATE OF TENNESSEE
AIR POLLUTION CONTROL BOARD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243



PROPOSED OPERATING PERMIT (TITLE V) Issued Pursuant to Tennessee Air Quality Act

This permit fulfills the requirements of Title V of the Federal Clean Air Act (42 U.S.C. 7661a-7661e) and the federal regulations promulgated thereunder at 40 CFR Part 70. (FR Vol. 57, No. 140, Tuesday, July 21, 1992, p.32295-32312). This permit is issued in accordance with the provisions of paragraph 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations (TAPCR). The permittee has been granted permission to operate an air contaminant source in accordance with emissions limitations and monitoring requirements set forth herein.

Date Issued: TBD, 2023

Permit Number:

Date Expires: TBD, 2028

579026

Issued To:

Marvin Windows of Tennessee, Inc.

Installation Address:

101 Marvin Road
Ripley

Installation Description:

01: Woodworking operations #1 with wood dust collection from saws, molders, jointers, CNC machines, and wood hog with load-out to bins/trucks using cyclones and fabric filters for particulate control

05: Dip tank for applying wood preservatives

10: Surface coating process with primer, sealer, and (display unit) spray booth operations

17: Surface coating with fan coater of linear wood parts (wood bead)

18: Assembly operations (Source K) including glass cleaning, hand painting, primer coating, sealant application, and spray booths

19: Gluing operations (Source J) for wooden and fiberglass/ wood composite parts

20: Custom color paint line for coating of aluminum extrusions, with curing oven subject to NESHAP (Subpart HHHHHH)

22: Woodworking operations #2 with CNC machines, shapers, saws, disk sanders using fabric filter control

Facility ID: 49-0068

Renewal Application Due Date:

Between TBD, 2028 and TBD, 2028-29

Primary SIC: 24

Information Relied Upon:

Title V permit dated November 23, 2010

Minor Permit Modification #1 issued April 2, 2012

Minor Permit Modification #2 issued October 29, 2014

Administrative Permit Amendment #1 issued April 27, 2015

Title V renewal application dated May 21, 2015

Title V renewal application dated April 20, 2021

(continued on the next page)

TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

POST AT INSTALLATION ADDRESS

7/11/19

RDA-1298

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ATTACHMENT 1	Opacity Matrix Decision Tree for Visible Emission Evaluation by EPA Method 9, dated June 18, 1996 Amended September 11, 2013.....	1 page
ATTACHMENT 2	Compliance Assurance Monitoring (CAM) PLAN	2 pages
ATTACHMENT 3	FORM APC 36	2 pages
ATTACHMENT 4	FORM HHHHHH Annual Notification of Changes	2 pages
ATTACHMENT 5	Source 05 and 10 VOC Agreement Letter	1 pages

SECTION A

GENERAL PERMIT CONDITIONS

A permit issued under the provisions of paragraph 1200-03-09-.02(11) is a permit issued pursuant to the requirements of Title V of the Federal Act and its implementing Federal regulations promulgated at 40 CFR, Part 70.

- A1. Definitions.** Terms not otherwise defined in the permit shall have the meaning assigned to such terms in the referenced regulation.

TAPCR 1200-03

- A2. Compliance requirement.** All terms and conditions in a permit issued pursuant to paragraph 1200-03-09-.02(11) including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act.

The permittee shall comply with all conditions of its permit. Except for requirements specifically designated herein as not being federally enforceable (State Only), non-compliance with the permit requirements is a violation of the Federal Act and the Tennessee Air Quality Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Non-compliance with permit conditions specifically designated herein as not being federally enforceable (State Only) is a violation of the Tennessee Air Quality Act and may be grounds for these actions.

TAPCR 1200-03-09-.02(11)(e)2(i) and 1200-03-09-.02(11)(e)1(vi)(I)

- A3. Need to halt or reduce activity.** The need to halt or reduce activity is not a defense for noncompliance. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this item shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations.

TAPCR 1200-03-09-.02(11)(e)1(vi)(II)

- A4. The permit.** The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

TAPCR 1200-03-09-.02(11)(e)1(vi)(III)

- A5. Property rights.** The permit does not convey any property rights of any sort, or any exclusive privilege.

TAPCR 1200-03-09-.02(11)(e)1(vi)(IV)

- A6. Submittal of requested information.** The permittee shall furnish to the Technical Secretary, within a reasonable time, any information that the Technical Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or termination of the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Technical Secretary copies of records required to be kept by the permit. If the permittee claims that such information is confidential, the Technical Secretary may review that claim and hold the information in protected status until such time that the Board can hear any contested proceedings regarding confidentiality disputes. If the information is desired by EPA, the permittee may mail the information directly to EPA. Any claims of confidentiality for federal purposes will be determined by EPA.

TAPCR 1200-03-09-.02(11)(e)1(vi)(V)

- A7. Severability clause.** The requirements of this permit are severable. A dispute regarding one or more requirements of this permit does not invalidate or otherwise excuse the permittee from their duty to comply with the remaining portion of the permit.

TAPCR 1200-03-09.02(11)(e)1(v)

A8. Fee payment.

(a) The permittee shall pay an annual Title V emission fee based upon the responsible official's choice of actual emissions, allowable emissions, or a combination of actual and allowable emissions; and on the responsible official's choice of annual accounting period. An emission cap of 4,000 tons per year per regulated pollutant per major source SIC Code shall apply to actual or allowable based emission fees. A Title V annual emission fee will not be charged for emissions in excess of the cap. Title V annual emission fees will not be charged for carbon monoxide or for greenhouse gas pollutants solely because they are greenhouse gases.

(b) Title V sources shall pay allowable based emission fees until the beginning of the next annual accounting period following receipt of their initial Title V operating permit. At that time, the permittee shall begin paying their Title V fee based upon their choice of actual or allowable based fees, or mixed actual and allowable based fees. Once permitted, the Responsible Official may revise their existing fee choice by submitting a written request to the Division no later than December 31 of the annual accounting period for which the fee is due.

(c) When paying annual Title V emission fees, the permittee shall comply with all provisions of 1200-03-26-.02 and 1200-03-09-.02(11) applicable to such fees.

(d) Where more than one (1) allowable emission limit is applicable to a regulated pollutant, the allowable emissions for the regulated pollutants shall not be double counted. Major sources subject to the provisions of paragraph 1200-03-26-.02(9) shall apportion their emissions as follows to ensure that their fees are not double counted.

1. Sources that are subject to federally promulgated hazardous air pollutant under 40 CFR 60, 61, or 63 will place such regulated emissions in the regulated hazardous air pollutant (HAP) category.

2. A category of miscellaneous HAPs shall be used for hazardous air pollutants listed at part 1200-03-26-.02(2)(i)12 that are not subject to federally promulgated hazardous air pollutant standards under 40 CFR 60, 61, or 63.

3. HAPs that are also in the family of volatile organic compounds, particulate matter, or PM₁₀ shall not be placed in either the regulated HAP category or miscellaneous HAP category.

4. Sources that are subject to a provision of chapter 1200-03-16 New Source Performance Standards (NSPS) or chapter 0400-30-39 Standards of Performance for New Stationary Sources for pollutants that are neither particulate matter, PM₁₀, sulfur dioxide (SO₂), volatile organic compounds (VOC), nitrogen oxides (NO_x), or hazardous air pollutants (HAPs) will place such regulated emissions in an NSPS pollutant category.

5. The regulated HAP category, the miscellaneous HAP category, and the NSPS pollutant category are each subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

6. Major sources that wish to pay annual emission fees for PM₁₀ on an allowable emission basis may do so if they have a specific PM₁₀ allowable emission standard. If a major source has a total particulate emission standard but wishes to pay annual emission fees on an actual PM₁₀ emission basis, it may do so if the PM₁₀ actual emission levels are proven to the satisfaction of the Technical Secretary. The method to demonstrate the actual PM₁₀ emission levels must be made as part of the source's major source operating permit in advance in order to exercise this option. The PM₁₀ emissions reported under these options shall not be subject to fees under the family of particulate emissions. The 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i) shall also apply to PM₁₀ emissions.

TAPCR 1200-03-26-.02 and 1200-03-09-.02(11)(e)1(vii)

- A9. Permit revision not required.** A permit revision will not be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or process for changes that are provided for in the permit.

TAPCR 1200-03-09-.02(11)(e)1(viii)

- A10. Inspection and entry.** Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Technical Secretary or an authorized representative to perform the following for the purposes of determining compliance with the permit applicable requirements:

(a) Enter upon, at reasonable times, the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by the Clean Air Act and Chapter 1200-03-10 of TAPCR, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
- (e) "Reasonable times" shall be considered to be customary business hours unless reasonable cause exists to suspect noncompliance with the Act, Division 1200-03 or any permit issued pursuant thereto and the Technical Secretary specifically authorizes an inspector to inspect a facility at any other time.

TAPCR 1200-03-09-.02(11)(e)3.(ii)

A11. Permit shield.

- (a) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date of permit issuance, provided that:
 - 1. Such applicable requirements are included and are specifically identified in the permit; or
 - 2. The Technical Secretary, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- (b) Nothing in this permit shall alter or affect the following:
 - 1. The provisions of section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section. Similarly, the provisions of T.C.A. §68-201-109 (emergency orders) including the authority of the Governor under the section;
 - 2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - 3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Federal Act; or
 - 4. The ability of EPA to obtain information from a source pursuant to section 114 of the Federal Act.
- (c) Permit shield is granted to the permittee.

TAPCR 1200-03-09-.02(11)(e)6

A12. Permit renewal and expiration.

- (a) An application for permit renewal must be submitted at least 180 days, but no more than 270 days prior to the expiration of this permit. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted.
- (b) If the permittee submits a timely and complete application for permit renewal the source will not be considered to be operating without a permit until the Technical Secretary takes final action on the permit application, except as otherwise noted in paragraph 1200-03-09-.02(11).
- (c) This permit, its shield provided in Condition A11, and its conditions will be extended and effective after its expiration date provided that the source has submitted a timely, complete renewal application to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)2 and 3, 1200-03-09-.02(11)(d)1(i)(III), and 1200-03-09-.02(11)(a)2

A13. Reopening for cause.

- (a) A permit shall be reopened and revised prior to the expiration of the permit under any of the circumstances listed below:
 - 1. Additional applicable requirements under the Federal Act become applicable to the sources contained in this permit provided the permit has a remaining term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the permit expiration date of this permit, unless the original has been extended pursuant to 1200-03-09-.02(11)(a)2.
 - 2. Additional requirements become applicable to an affected source under the acid rain program.
 - 3. The Technical Secretary or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - 4. The Technical Secretary or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (b) Proceedings to reopen and issue a permit shall follow the same proceedings as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists, and not the entire permit. Such reopening shall be made as expeditiously as practicable.
- (c) Reopenings for cause shall not be initiated before a notice of such intent is provided to the permittee by the Technical Secretary at least 30 days in advance of the date that the permit is to be reopened except that the Technical Secretary may provide

a shorter time period in the case of an emergency. An emergency shall be established by the criteria of T.C.A. 68-201-109 or other compelling reasons that public welfare is being adversely affected by the operation of a source that is in compliance with its permit requirements.

(d) If the Administrator finds that cause exists to terminate, modify, or revoke and reissue a permit as identified in A13, he is required under federal rules to notify the Technical Secretary and the permittee of such findings in writing. Upon receipt of such notification, the Technical Secretary shall investigate the matter in order to determine if he agrees or disagrees with the Administrator's findings. If he agrees with the Administrator's findings, the Technical Secretary shall conduct the reopening in the following manner:

1. The Technical Secretary shall, within 90 days after receipt of such notification, forward to EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate. If the Administrator grants additional time to secure permit applications or additional information from the permittee, the Technical Secretary shall have the additional time period added to the standard 90-day time period.
2. EPA will evaluate the Technical Secretary's proposed revisions and respond as to their evaluation.
3. If EPA agrees with the proposed revisions, the Technical Secretary shall proceed with the reopening in the same manner prescribed under Condition A13 (b) and Condition A13 (c).
4. If the Technical Secretary disagrees with either the findings or the Administrator that a permit should be reopened or an objection of the Administrator to a proposed revision to a permit submitted pursuant to Condition A13(d), he shall bring the matter to the Board at its next regularly scheduled meeting for instructions as to how he should proceed. The permittee shall be required to file a written brief expressing their position relative to the Administrator's objection and have a responsible official present at the meeting to answer questions for the Board. If the Board agrees that EPA is wrong in their demand for a permit revision, they shall instruct the Technical Secretary to conform to EPA's demand, but to issue the permit under protest preserving all rights available for litigation against EPA.

TAPCR. 1200-03-09-.02(11)(f)6 and 7.

A14. Permit transference. An administrative permit amendment allows for a change of ownership or operational control of a source where the Technical Secretary determines that no other change in the permit is necessary, provided that the following requirements are met:

- (a) Transfer of ownership permit application is filed consistent with the provisions of 1200-03-09-.03(6), and
- (b) written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)4(i)(IV) and 1200-03-09-.03(6)

A15. Air pollution alert. When the Technical Secretary has declared that an air pollution alert, an air pollution warning, or an air pollution emergency exists, the permittee must follow the requirements for that episode level as outlined in TAPCR 1200-03-09-.03(1) and TAPCR 1200-03-15-.03.

A16. Construction permit required. Except as exempted in TAPCR 1200-03-09-.04, or excluded in subparagraph TAPCR 1200-03-02-.01(1)(aa) or subparagraph TAPCR 1200-03-02-.01(1)(cc), this facility shall not begin the construction of a new air contaminant source or the modification of an air contaminant source which may result in the discharge of air contaminants without first having applied for and received from the Technical Secretary a construction permit for the construction or modification of such air contaminant source.

TAPCR 1200-03-09-.01(1)(a)

A17. Notification of changes. The permittee shall notify the Technical Secretary 30 days prior to commencement of any of the following changes to an air contaminant source which would not be a modification requiring a construction permit.

- (a) change in air pollution control equipment
- (b) change in stack height or diameter
- (c) change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

TAPCR 1200-03-09-.02(7)

A18. Schedule of compliance. The permittee will comply with any applicable requirement that becomes effective during the permit term on a timely basis. If the permittee is not in compliance the permittee must submit a schedule for coming into compliance which must include a schedule of remedial measure(s), including an enforceable set of deadlines for specific actions.

TAPCR 1200-03-09-.02(11)(d)3 and 40 CFR Part 70.5(c)

A19. Title VI.

(a) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:

1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to Section 82.156.
2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to Section 82.158.
3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to Section 82.161.

(b) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

(c) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR, Part 82, Subpart G, Significant New Alternatives Policy Program.

A20. 112 (r). Sources which are subject to the provisions of Section 112(r) of the federal Clean Air Act, or any federal regulations promulgated thereunder, shall annually certify in writing to the Technical Secretary that they are properly following their accidental release plan. The annual certification is due in the office of the Technical Secretary no later than January 31 of each year. Said certification will be for the preceding calendar year.

TAPCR 1200-03-32-.03(3)

SECTION B

GENERAL CONDITIONS for MONITORING, REPORTING, and ENFORCEMENT

B1. Recordkeeping. Monitoring and related record keeping shall be performed in accordance with the requirements specified in the permit conditions for each individual permit unit. In no case shall reports of any required monitoring and record keeping be submitted less frequently than every six months.

(a) Where applicable, records of required monitoring information include the following:

1. The date, place as defined in the permit, and time of sampling or measurements;
2. The date(s) analyses were performed;
3. The company or entity that performed the analysis;
4. The analytical techniques or methods used;
5. The results of such analyses; and
6. The operating conditions as existing at the time of sampling or measurement.

(b) Digital data accumulation which utilizes valid data compression techniques shall be acceptable for compliance determination as long as such compression does not violate an applicable requirement and its use has been approved in advance by the Technical Secretary.

TAPCR 1200-03-09-.02(11)(e)1(iii)

B2. Retention of monitoring data. The permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

TAPCR 1200-03-09-.02(11)(e)1(iii)(II)II

B3. Reporting. Reports of any required monitoring and record keeping shall be submitted to the Technical Secretary in accordance with the frequencies specified in the permit conditions for each individual permit unit. Reports shall be submitted within 60 days of the close of the reporting period unless otherwise noted. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. Reports required under "State only requirements" are not required to be certified by a responsible official.

TAPCR 1200-03-09-.02(11)(e)1(iii)

B4. Certification. Except for reports required under "State Only" requirements, any application form, report or compliance certification submitted pursuant to the requirements of this permit shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

TAPCR 1200-03-09-.02(11)(d)4

B5. Annual compliance certification. The permittee shall submit annually compliance certifications with terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

- (a) The identification of each term or condition of the permit that is the basis of the certification;
- (b) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
- (c) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in B5(b) above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion* or exceedance** as defined below occurred; and
- (d) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* "Excursion" shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No.144, July 28, 2014, pages 43661 through 43667

B6. Submission of compliance certification. The compliance certification shall be submitted to:

The Tennessee Department of Environment and Conservation Environmental Field Office specified in Section E of this permit	and	Air Enforcement Branch US EPA Region IV 61 Forsyth Street, SW Atlanta, Georgia 30303
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TAPCR 1200-03-09-.02(11)(e)3(v)(IV)

B7. Emergency provisions. An emergency constitutes an affirmative defense to an enforcement action brought against this source for noncompliance with a technology-based emission limitation due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(a) The affirmative defense of the emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

1. An emergency occurred, and that the permittee can identify the probable cause(s) of the emergency. "Probable" must be supported by a credible investigation into the incident that seeks to identify the causes and results in an explanation supported by generally accepted engineering or scientific principles.

2. The permitted source was at the time being properly operated. In determining whether or not a source was being properly operated, the Technical Secretary shall examine the source's written standard operating procedures which were in effect at the time of the noncompliance and any other code as detailed below that would be relevant to preventing the noncompliance. Adherence to the source's standard operating procedures will be the test of adequate preventative maintenance, careless operation, improper operation or operator error to the extent that such adherence would prevent noncompliance. The source's failure to follow recognized standards of practice to the extent that adherence to such a standard would have prevented noncompliance will disqualify the source from any claim of an emergency and an affirmative defense.

3. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

4. The permittee submitted notice of the emergency to the Technical Secretary according to the notification criteria for malfunctions in rule 1200-03-20-.03. For the purposes of this condition, "emergency" shall be substituted for "malfunction(s)" in rule 1200-03-20-.03 to determine the relevant notification threshold. The notice shall include a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding the permittee seeking to establish the occurrence of an emergency has the burden of proof.

(c) The provisions of this condition are in addition to any emergency, malfunction or upset requirement contained in Division 1200-03 or other applicable requirement.

TAPCR 1200-03-09-.02(11)(e)7

B8. Excess emissions reporting.

(a) The permittee shall promptly notify the Technical Secretary when any emission source, air pollution control equipment, or related facility breaks down in such a manner to cause the emission of air contaminants in excess of the applicable emission standards contained in Division 1200-03 or any permit issued thereto, or of sufficient duration to cause damage to property or public health. The permittee must provide the Technical Secretary with a statement giving all pertinent facts, including the estimated duration of the breakdown. Violations of the visible emission standard which occur for less than 20 minutes in one day (midnight to midnight) need not be reported. Prompt notification will be within 24 hours of the malfunction and shall be provided by telephone to the Division's Nashville office. The Technical Secretary shall be notified when the condition causing the failure or breakdown has been corrected. In attainment and unclassified areas if emissions other than from sources designated as significantly impacting on a nonattainment area in excess of the standards will not and do not occur over more than a 24-hour period (or will not recur over more than a 24-hour period) and no damage to property and or public health is anticipated, notification is not required.

(b) Any malfunction that creates an imminent hazard to health must be reported by telephone immediately to the Division's Nashville office at (615) 532-0554 and to the State Civil Defense.

(c) A log of all malfunctions, startups, and shutdowns resulting in emissions in excess of the standards in Division 1200-03 or any permit issued thereto must be kept at the plant. All information shall be entered in the log no later than twenty-four (24) hours after the startup or shutdown is complete, or the malfunction has ceased or has been corrected. Any later discovered corrections can be added in the log as footnotes with the reason given for the change. This log must record at least the following:

1. Stack or emission point involved
2. Time malfunction, startup, or shutdown began and/or when first noticed
3. Type of malfunction and/or reason for shutdown
4. Time startup or shutdown was complete or time the air contaminant source returned to normal operation
5. The company employee making entry on the log must sign, date, and indicate the time of each log entry

The information under items 1. and 2. must be entered into the log by the end of the shift during which the malfunction or startup began. For any source utilizing continuous emission(s) monitoring, continuous emission(s) monitoring collection satisfies the above log keeping requirement.

TAPCR 1200-03-20-.03 and .04

B9. Malfunctions, startups and shutdowns - reasonable measures required. The permittee must take all reasonable measures to keep emissions to a minimum during startups, shutdowns, and malfunctions. These measures may include installation and use of alternate control systems, changes in operating methods or procedures, cessation of operation until the process equipment and/or air pollution control equipment is repaired, maintaining sufficient spare parts, use of overtime labor, use of outside consultants and contractors, and other appropriate means. Failures that are caused by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions. This provision does not apply to standards found in 40 CFR, Parts 60(Standards of performance for new stationary sources), 61(National emission standards for hazardous air pollutants) and 63(National emission standards for hazardous air pollutants for source categories).

TAPCR 1200-03-20-.02

B10. Reserved.

B11. Report required upon the issuance of a notice of violation for excess emissions. The permittee must submit within twenty (20) days after receipt of the notice of violation, the data required below. If this data has previously been available to the Technical Secretary prior to the issuance of the notice of violation no further action is required of the violating source. However, if the source desires to submit additional information, then this must be submitted within the same twenty (20) day time period. The minimum data requirements are:

- (a) The identity of the stack and/or other emission point where the excess emission(s) occurred;
- (b) The magnitude of the excess emissions expressed in pounds per hour and the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;
- (c) The time and duration of the emissions;
- (d) The nature and cause of such emissions;
- (e) For malfunctions, the steps taken to correct the situation and the action taken or planned to prevent the recurrence of such malfunctions;
- (f) The steps taken to limit the excess emissions during the occurrence reported, and
- (g) If applicable, documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good operating practices for minimizing emissions.

Failure to submit the required report within the twenty (20) day period specified shall preclude the admissibility of the data for determination of potential enforcement action.

TAPCR 1200-03-20-.06(2), (3) and (4)

SECTION C

PERMIT CHANGES

- C1. Operational flexibility changes.** The source may make operational flexibility changes that are not addressed or prohibited by the permit without a permit revision subject to the following requirements:
- (a) The change cannot be subject to a requirement of Title IV of the Federal Act or Chapter 1200-03-30.
 - (b) The change cannot be a modification under any provision of Title I of the federal Act or Division 1200-03.
 - (c) Each change shall meet all applicable requirements and shall not violate any existing permit term or condition.
 - (d) The source must provide contemporaneous written notice to the Technical Secretary and EPA of each such change, except for changes that are below the threshold of levels that are specified in Rule 1200-03-09-.04.
 - (e) Each change shall be described in the notice including the date, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change.
 - (f) The change shall not qualify for a permit shield under the provisions of part 1200-03-09-.02(11)(e)6.
 - (g) The permittee shall keep a record describing the changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. The records shall be retained until the changes are incorporated into subsequently issued permits.

TAPCR 1200-03-09-.02(11)(a)4 (ii)

- C2. Section 502(b)(10) changes.**
- (a) The permittee can make certain changes without requiring a permit revision, if the changes are not modifications under Title I of the Federal Act or Division 1200-03 and the changes do not exceed the emissions allowable under the permit. The permittee must, however, provide the Administrator and Technical Secretary with written notification within a minimum of 7 days in advance of the proposed changes. The Technical Secretary may waive the 7-day advance notice in instances where the source demonstrates in writing that an emergency necessitates the change. Emergency shall be demonstrated by the criteria of TAPCR 1200-03-09-.02(11)(e)7 and in no way shall it include changes solely to take advantages of an unforeseen business opportunity. The Technical Secretary and EPA shall attach each such notice to their copy of the relevant permit.
 - (b) The written notification must be signed by a facility Title V responsible official and include the following:
 - 1. a brief description of the change within the permitted facility;
 - 2. the date on which the change will occur;
 - 3. a declaration and quantification of any change in emissions;
 - 4. a declaration of any permit term or condition that is no longer applicable as a result of the change; and
 - 5. a declaration that the requested change is not a Title I modification and will not exceed allowable emissions under the permit.
 - (c) The permit shield provisions of TAPCR 1200-03-09-.02(11)(e)6 shall not apply to Section 502(b)(10) changes.

TAPCR 1200-03-09-.02(11)(a)4 (i)

- C3. Administrative amendment.**
- (a) Administrative permit amendments to this permit shall be in accordance with 1200-03-09-.02(11)(f)4. The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.
 - (b) The permit shield shall be extended as part of an administrative permit amendment revision consistent with the provisions of TAPCR 1200-03-09-.02(11)(e)6 for such revisions made pursuant to item (c) of this condition which meet the relevant requirements of TAPCR 1200-03-09-.02(11)(e), TAPCR 1200-03-09-.02(11)(f) and TAPCR 1200-03-09-.02(11)(g) for significant permit modifications.
 - (c) Proceedings to review and grant administrative permit amendments shall be limited to only those parts of the permit for which cause to amend exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)4

- C4. Minor permit modifications.**
- (a) The permittee may submit an application for a minor permit modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(ii).

- (b) The permittee may make the change proposed in its minor permit modification immediately after an application is filed with the Technical Secretary.
- (c) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.
- (d) Minor permit modifications do not qualify for a permit shield.

TAPCR 1200-03-09-.02(11)(f)5(ii)

C5. Significant permit modifications.

- (a) The permittee may submit an application for a significant modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(iv).
- (b) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)5(iv)

C6. New construction or modifications.

Future construction at this facility that is subject to the provisions of TAPCR 1200-03-09-.01 shall be governed by the following:

- (a) The permittee shall designate in their construction permit application the route that they desire to follow for the purposes of incorporating the newly constructed or modified sources into their existing operating permit. The Technical Secretary shall use that information to prepare the operating permit application submittal deadlines in their construction permit.

- (b) Sources desiring the permit shield shall choose the administrative amendment route of TAPCR 1200-03-09-.02(11)(f)4 or the significant modification route of TAPCR 1200-03-09-.02(11)(f)5(iv).

- (c) Sources desiring expediency instead of the permit shield shall choose the minor permit modification procedure route of TAPCR 1200-03-09-.02(11)(f)5(ii) or group processing of minor modifications under the provisions of TAPCR 1200-03-09-.02(11)(f)5(iii) as applicable to the magnitude of their construction.

TAPCR 1200-03-09-.02(11)(d) 1(i)(V)

SECTION D

GENERAL APPLICABLE REQUIREMENTS

- D1. Visible emissions.** With the exception of air emission sources exempt from the requirements of TAPCR Chapter 1200-03-05 and air emission sources for which a different opacity standard is specifically provided elsewhere in this permit, the permittee shall not cause, suffer, allow or permit discharge of a visible emission from any air contaminant source with an opacity in excess of twenty (20) percent for an aggregate of more than five (5) minutes in any one (1) hour or more than twenty (20) minutes in any twenty-four (24) hour period; provided, however, that for fuel burning installations with fuel burning equipment of input capacity greater than 600 million btu per hour, the permittee shall not cause, suffer, allow, or permit discharge of a visible emission from any fuel burning installation with an opacity in excess of twenty (20) percent (6-minute average) except for one six minute period per one (1) hour of not more than forty (40) percent opacity. Sources constructed or modified after July 7, 1992 shall utilize 6-minute averaging.

Consistent with the requirements of TAPCR Chapter 1200-03-20, due allowance may be made for visible emissions in excess of that permitted under TAPCR 1200-03-05 which are necessary or unavoidable due to routine startup and shutdown conditions. The facility shall maintain a continuous, current log of all excess visible emissions showing the time at which such conditions began and ended and that such record shall be available to the Technical Secretary or an authorized representative upon request.

TAPCR 1200-03-05-.01(1), TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.02(1)

- D2. General provisions and applicability for non-process gaseous emissions.** Any person constructing or otherwise establishing a non-portable air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize the best equipment and technology currently available for controlling such gaseous emissions.

TAPCR 1200-03-06-.03(2)

- D3. Non-process emission standards.** The permittee shall not cause, suffer, allow, or permit particulate emissions from non-process sources in excess of the standards in TAPCR 1200-03-06.

- D4. General provisions and applicability for process gaseous emissions.** Any person constructing or otherwise establishing an air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize equipment and technology which is deemed reasonable and proper by the Technical Secretary.

TAPCR 1200-03-07-.07(2)

- D5. Particulate emissions from process emission sources.** The permittee shall not cause, suffer, allow, or permit particulate emissions from process sources in excess of the standards in TAPCR 1200-03-07.

- D6. Sulfur dioxide emission standards.** The permittee shall not cause, suffer, allow, or permit Sulfur dioxide emissions from process and non-process sources in excess of the standards in TAPCR 1200-03-14. Regardless of the specific emission standard, new process sources shall utilize the best available control technology as deemed appropriate by the Technical Secretary of the Tennessee Air Pollution Control Board.

- D7. Fugitive Dust.**

(a) The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, but not be limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
2. Application of asphalt, water, or suitable chemicals on dirt roads, material stockpiles, and other surfaces which can create airborne dusts;

3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

(b) The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five (5) minutes per hour or twenty (20) minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in Chapter 1200-03-20.

TAPCR 1200-03-08

D8. Open burning. The permittee shall comply with the TAPCR 1200-03-04 for all open burning activities at the facility.

TAPCR 1200-03-04

D9. Asbestos. Where applicable, the permittee shall comply with the requirements of TAPCR 1200-03-11-.02(2)(d) when conducting any renovation or demolition activities at the facility.

TAPCR 1200-03-11-.02(2)(d) and 40 CFR, Part 61

D10. Annual certification of compliance. The generally applicable requirements set forth in Section D of this permit are intended to apply to activities and sources that are not subject to source-specific applicable requirements contained in State of Tennessee and U.S. EPA regulations. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related record keeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)1 and compliance requirements of TAPCR 1200-03-09-.02(11)(e)3.(i). The permittee shall submit compliance certification for these conditions annually.

D11. Emission Standards for Hazardous Air Pollutants. When applicable, the permittee shall comply with the TAPCR 0400-30-38 for all emission sources subject to a requirement contained therein.

TAPCR 0400-30-38

D12. Standards of Performance for New Stationary Sources. When applicable, the permittee shall comply with the TAPCR 0400-30-39 for all emission sources subject to a requirement contained therein.

TAPCR 0400-30-39

D13. Gasoline Dispensing Facilities. When applicable, the permittee shall comply with the TAPCR 1200-03-18-.24 for all emission sources subject to a requirement contained therein.

D14. Internal Combustion Engines.

- (a) All stationary reciprocating internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-38-.01.
- (b) All stationary compression ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-39-.01.
- (c) All stationary spark ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-39-.02.

TAPCR 0400-30-38 and 39

SECTION E**SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, and MONITORING, RECORDKEEPING and REPORTING REQUIREMENTS**

49-0068	Source Description:	This facility manufactures custom-made wooden doors and windows which includes woodworking operations, surface coating, application of wood preservatives, and assembly operations with glass cleaning, caulk sealing, hand painting, and gluing.
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Conditions E1 through E3-11 apply to all sources in Section E of this permit unless otherwise noted.

E1. Fee payment**FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 49-0068**

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	77.46	AEAR	Includes all fee emissions.
PM₁₀	N/A	N/A	
SO₂	N/A	N/A	
VOC	194.47	AEAR	Includes all fee emissions.
NO_x	N/A	N/A	
CATEGORY OF MISCELLANEOUS HAZARDOUS AIR POLLUTANTS (HAPs WITHOUT A STANDARD) *			
VOC FAMILY GROUP	N/A	AEAR	Fee emissions are included in VOC above.
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP	N/A	N/A	
CATEGORY OF SPECIFIC HAZARDOUS AIR POLLUTANTS (HAPs WITH A STANDARD) **			
VOC FAMILY GROUP	N/A	N/A	
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP	N/A	AEAR	NESHAP (40 CFR Part 63 Subpart HHHHHH). Fee emissions are included in PM above.
CATEGORY OF NSPS POLLUTANTS NOT LISTED ABOVE***			
EACH NSPS POLLUTANT NOT LISTED ABOVE	N/A	N/A	

NOTES

AAP The Annual Accounting Period (AAP) is a 12 consecutive month period that either (a) begins each July 1st and ends June 30th of the following year when fees are paid on a fiscal year basis, or (b) begins January 1st and ends December 31st of the same year when paying on a calendar year basis. The Annual Accounting Period at the time of permit renewal issuance began July 1, 2023, and ends June 30, 2024. The next Annual Accounting Period begins July 1, 2024, and ends June 30, 2025, unless a request to change the annual accounting period is submitted by the responsible official as required by subparagraph 1200-03-26-.02(9)(b) of the TAPCR and approved by the Technical Secretary. If the permittee wishes to revise their annual accounting period or their annual emission fee basis as allowed by subparagraph 1200-03-26-.02(9)(b) of the TAPCR, the responsible official must submit the request to the Division in writing on or before December 31 of the annual accounting period for which the fee is due. If a change in fee basis from allowable emissions to actual emissions for any pollutant is requested, the request from the responsible official must include the methods that will be used to determine actual emissions. Changes in fee bases must be made using the Title V Fee Selection form, form number APC 36 (CN-1583), included as Attachment 3 to this permit and available on the Division of Air Pollution Control's website.

N/A N/A indicates that no emissions are specified for fee computation.

AEAR If the permittee is paying annual emission fees on an actual emissions basis, **AEAR** indicates that an Actual Emissions Analysis is Required to determine the actual emissions of:

- (1) **each regulated pollutant** (Particulate matter, SO₂, VOC, NO_x and so forth. See TAPCR 1200-03-26-.02(2)(i) for the definition of a regulated pollutant.),
- (2) **each pollutant group** (VOC Family, Non-VOC Gaseous, and Particulate Family),
- (3) **the Miscellaneous HAP Category,**
- (4) **the Specific HAP Category, and**
- (5) **the NSPS Category**

under consideration during the **Annual Accounting Period**.

* **Category Of Miscellaneous HAP (HAP Without a Standard):** This category is made-up of hazardous air pollutants that do not have a federal or state standard. Each HAP is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation,** the **Miscellaneous HAP Category** is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

** **Category Of Specific HAP (HAP With a Standard):** This category is made-up of hazardous air pollutants (HAP) that are subject to Federally promulgated Hazardous Air Pollutant Standards that can be imposed under Chapter 1200-03-11 or Chapter 1200-03-31. Each individual hazardous air pollutant is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation,** each individual hazardous air pollutant of the **Specific HAP Category** is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

*** **Category Of NSPS Pollutants Not Listed Above:** This category is made-up of each New Source Performance Standard (NSPS) pollutant whose emissions are not included in the **PM, SO₂, VOC or NO_x** emissions from each source in this permit. **For fee computation,** each **NSPS pollutant not listed above** is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

END NOTES

- The permittee shall:**
- (1) Pay Title V **annual emission fees**, on the emissions and year bases requested by the responsible official and approved by the Technical Secretary, for each annual accounting period (AAP) by the payment deadline(s) established in TAPCR 1200-03-26-.02(9)(g). Fees may be paid on an **actual, allowable, or mixed** emissions basis; and on either a **state fiscal year** or a **calendar year**, provided the requirements of TAPCR 1200-03-26-.02(9)(b) are met. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8).
 - (2) Sources paying annual emissions fees on an allowable emissions basis: pay annual allowable based emission fees for each annual accounting period no later than April 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d).
 - (3) Sources paying annual emissions fees on an actual emissions basis: prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
 - (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and
 - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the annual fee basis approved by the Technical Secretary (a state fiscal year [July 1 through June 30] or a calendar year [January 1 through December 31]). These records shall be used to complete the **actual emissions analyses** required by the above **Fee Emissions Summary Table**.

- (4) Sources paying annual emissions fees on a mixed emissions basis: for all pollutants and all sources for which the permittee has chosen an actual emissions basis, prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
- (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and
 - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the fee bases approved by the Technical Secretary (payment on an actual or mixed emissions basis) and payment on a state fiscal year (July 1 through June 30) or a calendar year (January 1 through December 31). These records shall be used to complete the **actual emissions analysis**.
- For all pollutants and all sources for which the permittee has chosen an allowable emissions basis, pay allowable based emission fees pursuant to TAPCR 1200-03-26-.02(9)(d).
- (5) When paying on an actual or mixed emissions basis, submit the **actual emissions analyses** at the time the fees are paid in full.

The annual emission fee due dates are specified in TAPCR 1200-03-26-.02(9)(g) and are dependent on the Responsible Official's choice of fee bases as described above. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8). Emissions for regulated pollutants shall not be double counted as specified in Condition A8(d) of this permit.

Payment of the fee due and the actual emissions analysis (if required) shall be submitted to The Technical Secretary at the following address:

Payment of Fee to:

The Tennessee Department of Environment and Conservation
Division of Fiscal Services
Consolidated Fee Section – APC
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 10th Floor
Nashville, Tennessee 37243

and

Actual Emissions Analyses to:

The Tennessee Department of Environment and Conservation
Division of Air Pollution Control
Emission Inventory Program
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, Tennessee 37243

or

An electronic copy (PDF) of actual emissions analysis can also be submitted to: apc.inventory@tn.gov

E2. Reporting requirements.

- (a) **Semiannual reports.** Semiannual reports shall cover the six-month periods from **January 1** to **June 30** and **July 1** to **December 31** and shall be submitted within 60 days after the end of each six-month period. Subsequent reports shall be submitted within 60 days after the end of each 6-month period following the first report. The first semiannual report following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period Begins	Reporting Period Ends
Old permit #570323	July 1, 2023	day before new permit issuance (with year)
New permit #579026	Issuance Date of new permit (with year)	December 31, 2023

These semiannual reports shall include:

- (1) Any monitoring and recordkeeping required by conditions **E3-3 (Logs 1 and 2), E4-2, E5-1, E5-2, E6-1, E6-2, E6-3, E7-1, E7-2, E8-1, E8-2, E8-3, E9-1, E9-2, E10-6, E10-7, E10-8, and E11-2** of this permit. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (2) The visible emission evaluation readings from condition **E3-9 and E6-4** of this permit if required. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (3) Identification of all instances of deviations from **ALL PERMIT REQUIREMENTS**.

These reports must be certified by a responsible official consistent with condition B4 of this permit and shall be submitted to The Technical Secretary at the address in Condition E2(b) of this permit.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

(b) Annual compliance certification. The permittee shall submit annually compliance certifications with each term or condition contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

- (1) The identification of each term or condition of the permit that is the basis of the certification;
- (2) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; Such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
- (3) The status of compliance with each term or condition of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in E2(b)2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion* or exceedance** as defined below occurred; and
- (4) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* “Excursion” shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** “Exceedance” shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

Annual compliance certifications shall cover the 12-month period from **January 1** to **December 31** and shall be submitted within 60 days after the end of each 12-month period. The first annual compliance certification following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period Begins	Reporting Period Ends
Old permit #570323	January 1, 2023	day before new permit issuance (with year)
New Permit #579026	Issuance Date of new permit (with year)	December 31, 2023

These certifications shall be submitted to: **TN APCD** and **EPA**

Jackson Environmental Field Office
Division of Air Pollution Control
1625 Hollywood Drive
Jackson, TN 38305
or
APC.JackEFO@tn.gov

Air Enforcement Branch
US EPA Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303
and
or
Through the EPA CDX
(<https://cdx.epa.gov/>)

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No.144, July 28, 2014, pages 43661 through 43667
TAPCR 1200-03-09-.02(11)(e)3.(v)

(c) **40 CFR 63 Subpart HHHHHH Reports for Miscellaneous Surface Coating at Area Source**

The permittee is required to submit a report each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. This includes notification when paint stripping affected sources that have not developed and implemented a written MeCl minimization plan in accordance with [§ 63.11173\(b\)](#) used more than one ton of MeCl in the previous calendar year. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in [paragraphs \(a\)\(1\)](#) through [\(2\)](#) of this section. These notifications are required under the provisions of 40 CFR §63.11176. A sample Notification of Changes can be found in **Attachment 4**. If no changes or deviations occur for the annual reporting period, the report is not required to be submitted. Notifications shall be sent to both addresses below:

Division of Air Pollution Control
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
or
Air.Pollution.Control@tn.gov

Air Enforcement Branch
US EPA Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303
and
or
Through the EPA CDX
(<https://cdx.epa.gov/>)

- (d) **Retention of Records** All records required by any condition in Section E of this permit must be retained for a period of not less than five years. Additionally, these records shall be kept available for inspection by the Technical Secretary or a Division representative.

TAPCR 1200-03-09-.02(11)(e)1.(iii)(II)II

E3. General Permit Requirements

E3-1. Identification of Responsible Official and Technical Contact

- (a) The application that was utilized in the preparation of this permit is dated April 20, 2021, and is signed by Michael Enoch, Plant Manager the Responsible Official of the permitted facility at the time of application submittal. The letter dated July 28, 2022, names Jaime Schilling, Plant Manager as the Responsible Official of the permitted facility. If this person terminates employment or is assigned different duties and is no longer a Responsible Official for this facility as defined in part 1200-03-09-.02(11)(b)21 of the Tennessee Air Pollution Control Regulations, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Responsible Official and certification of truth and accuracy. All representations, agreement to terms and conditions, and covenants made by the former Responsible Official that were used in the establishment of the permit terms and conditions will

- (b) The application that was utilized in the preparation of this permit is dated April 20, 2021, and identifies Jay Caldwell, as the Principal Technical Contact for the permitted facility. If this person terminates employment or is assigned different duties and is no longer the Principal Technical Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Principal Technical Contact and certification of truth and accuracy.
- (c) The application that was utilized in the preparation of this permit is dated April 20, 2021, and identifies Jay Caldwell, as the Billing Contact for the permitted facility. If this person terminates employment or is assigned different duties and is no longer the Billing Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

- TAPCR 1200-03-09

(1) Emissions in tons of each Hazardous Air Pollutant, (2) Emissions in tons of all Hazardous Air Pollutants, (3) Emissions in tons of VOCs excluding exempt compounds as defined in 1200-03-18-.01(26) of the Tennessee Air Pollution Control Regulations. Logs of information in the formats provided or in an alternate format providing the same information must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. The logs are used to account for VOC, VOC HAP, and non-VOC HAP emissions from input material and fuel burning which release emissions in these categories. Records shall also be retained to verify the VOC and HAP content of each material. This may include MSDS and/or SDS, formulation data, or other documentation to establish the VOC and HAP content. These logs must be retained for a period of not less than five (5) years.

Source: _____ Month: _____ Year: _____

Material Name	Usage (gal/month)	VOC Content (lb/gal)	VOC Emissions (ton/month)	HAP 1 Content (lb/gal)	HAP 1 Emissions (ton/month)	HAP 2 Content (lb/gal)	HAP 2 Emissions (ton/month)	Total HAPs Emitted (ton/month)
TOTAL								

LOG 2: Log for VOC emissions for 12-consecutive month periods for compliance purposes for each VOC emission source

Month / Year	VOC Emissions (lb/month)	VOC Emissions (ton/month)	VOC Emissions (*) for individual source _____ (tons per 12-consecutive months)

(*) The Tons per 12-consecutive months value is the sum of the VOC emissions in the 11 months preceding the month just completed + the VOC emissions in the month just completed. This log is the total amount of VOCs emitted to the air on a 12-consecutive month basis.

LOG 3: Log for HAP emissions during 12-consecutive month intervals for all sources combined (see Log 1 of this condition). This data is obtained from the individual and combined HAP emission data from Log 1 and is combined in Log 3 below for plant wide individual HAPs and combined HAPs

Source: _____

Month/ Year	HAP ₁ Emissions (tons)	HAP ₁ Emissions per 12-consecutive months (tons)*	HAP ₂ Emissions (tons)	HAP ₂ Emissions per 12-consecutive months (tons)*	HAP _n Emissions (tons)	HAP _n Emissions per 12-consecutive months (tons)*	HAP _{TOTAL} Emissions (tons)	HAP _{TOTAL} Emissions per 12-consecutive months (tons)*

(*) The tons per 12-consecutive months values are the sum of the emissions in the 11 months preceding the month just completed + the emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this table, this value will be equal to the value for tons per month. For the second month, it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed [i.e., 6 (2) represents 6 tons emitted in 2 months]. This log is the total amount of HAP emitted to the air during each 12-consecutive months interval.

The permittee has determined the plant wide worst case maximum particulate matter HAP emission rate as 1.454 tons per 12-consecutive month period for individual HAPs and 1.454 tons per 12-consecutive month period for combined HAPs. These values shall be added to the individual and combined HAP emissions in Log 3 above for each set of calculations.

Also, the permittee has determined the plant wide worst case VOC HAPs emission rate from insignificant activities at this facility as 0.076 tons per 12-consecutive month period for individual HAPs and 0.15 tons per 12-consecutive month period for combined HAPs. These values shall be added to the individual and combined HAP emissions in Log 3 above for each set of calculations.

TAPCR 1200-03-10-.02(2)(a)

- E3-4.** Record keeping requirements for this facility, including all data and calculations, must be updated and maintained based on the following schedule:

<u>Record Keeping Type</u>	<u>Update Requirement</u>
Monthly Log	Recorded within 30 days after the end of the month
Weekly Log	Recorded within 7 days after the end of the week
Daily Log	Recorded within 7 days after the end of the day

TAPCR 1200-03-10-.02(2)(a)

Compliance Method: Maintain the recordkeeping schedule as required.

- E3-5.** Logs and records specified in this permit shall be made available upon request by the Technical Secretary or his representative and shall be retained for a period of not less than 5 years unless otherwise noted. Logs and records contained in this permit are based on a recommended format. Any logs that have an alternative format may be utilized provided such logs contain the same information that is required. Computer-generated logs are also acceptable. Logs and records are not required to be submitted semiannually unless specified in Condition **E2(a)(1)**.

TAPCR 1200-03-10-.02(2)(a)

Compliance Method: Included with the requirement.

- E3-6.** Routine maintenance as required to comply with the specified emission limits shall be performed on the air pollution control devices. Monthly logs of maintenance and/or repair for each air pollution control device shall be kept. This includes, but is

not limited to, baghouses, cyclones, and other air pollution control devices. The logs shall denote what maintenance and what repair was done, when it was done, by whom, and when problems were rectified, denoting date accomplished. Use of computer-generated logs is also acceptable. Each maintenance/repair log must be made available upon request by the Technical Secretary or his representative. Such logs must be maintained for 5 years. Records from these logs are not required to be submitted semiannually unless required in Condition **E2(a)(1)**.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

Compliance Method: Included with the requirement.

- E3-7.** Upon the malfunction/failure of any emission control device(s) serving this source, the operation of the process(es) served by the device(s) shall be regulated by Chapter 1200-03-20 of the Tennessee Air Pollution Control Regulations.

TAPCR 1200-03-20

Compliance Method: Following the requirements as identified in TAPCR 1200-03-20.

- E3-8.** Pursuant to TAPCR 1200-03-10-.04(2)(a)2, gauges, indicators, and similar devices used to measure and conduct parametric monitoring of control equipment must maintain an operational availability of at least 95%. Logs and records to substantiate such operational availability must be kept and such records shall be made available to the Technical Secretary or his representative upon request.

TAPCR 1200-03-10-.04(2)(a)2

Compliance Method: Following the requirements as identified in TAPCR 1200-03-10-.04(2)(a)2.

- E3-9.** Visible emissions from any stack at this facility unless otherwise noted shall not exhibit greater than twenty percent (20%) opacity, except for one (1) six-minute period in any one (1) hour period, and for no more than four (4) six-minute periods in any twenty-four (24) hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.01(1)

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996, and amended September 11, 2013 (**Attachment 1**).

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

- E3-10.** The permittee is not required to file an accidental release plan pursuant to Section 112(r) of the Clean Air Act and 1200-03-32 of TAPCR.

TAPCR 1200-03-32

Compliance Method: Following the requirement as identified in TAPCR 1200-03-32.

- E3-11.** **CAM Plan.** This facility is currently subject to regulations under 40 CFR part 64 (Compliance Assurance Monitoring) for source 49-0068-01 and 49-0068-22, as specified in attachment 2.

- E3-12.** This Title V Operating Permit No. 579026 is a renewal of previous Title V permit 570323 issued November 8, 2016.

- E3-13.** If the emissions of a single HAP or combined HAPs from this facility ever reach a level of 10 tons or 25 tons per 12-month period, respectively, the Division shall be notified within fifteen days of this determination. The facility may then become subject to the provisions of one or more of the following MACT regulations found at 40 CFR 63:

1. Subpart JJ—National Emission Standards for Wood Furniture Manufacturing Operations
2. Subpart MMMM—National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products
3. Subpart PPPP—National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products
4. Subpart QQQQ—National Emission Standards for Hazardous Air Pollutants for Surface Coating of Wood Building Products

E3-14. Insignificant activities

Insignificant activities as stated by the permittee in the Title V Application per Rule 1200-03-09-.04(5) are listed below. Additional insignificant activities may be added and operated at any time with the provision that a written notification shall be submitted to the Technical Secretary including an updated APC 2 application form along with a truth, accuracy, and completeness statement signed by a responsible official. The permit may be updated to include additional insignificant sources by means of an administrative amendment, if necessary.

Activity	Reason for Being an Insignificant Activity
Diesel Fuel Storage Tank – 550-gallon capacity	1200-03-09-.04(5)(f)17
Gasoline Storage Tank – 550-gallon capacity	1200-03-09-.04(5)(f)17
Motor Oil Storage Tank – 500-gallon capacity	1200-03-09-.04(5)(f)17
Used Oil Storage Tank – 750-gallon capacity	1200-03-09-.04(5)(f)17
Emergency Natural Gas Fired Generator for computer server room	1200-03-09-.04(5)(f)(37)

49-0068-01	Source Description:	Woodworking operations #1 with wood dust collection from saws, molders, jointers, CNC machines, and wood hog with 2 load-outs to trucks by bin and auger release using cyclones and fabric filters for particulate control. Shavings transport to storage silo (baghouse bin vent). Emission points: Fabric filters S-2, S-4, and S-5, Cyclones S-1 and S-3 (exhaust returned back into the building with emergency/bypass venting capability if needed). (CAM Plan – Attachment 2)
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Conditions **E4-1** and **E4-2** apply to source 49-0068-01 as indicated.

E4-1. Maximum wood usage rate shall not exceed 7500 pounds per hour. If this capacity is exceeded, a permit modification or construction permit will be required.

Compliance Method: The Technical Secretary may require permittee to demonstrate compliance with this rate.

E4-2. Particulate matter emitted from this source shall not exceed 8.15 pounds per hour.

TAPCR 1200-03-07-.03(1)

Compliance Method: Compliance with the particulate emission limitation shall be assured by monitoring and recording the following:

A daily log of fabric filter pressure drop readings shall be kept. A minimum of one reading per day shall be taken when the dust collection system is in operation. The days when the source does not operate shall be noted. The minimum acceptable pressure drop readings of the fabric filter pressure gauges shall be as follows:

Pressure Gauge Number	1	2	3
Fabric Filter	S-2, primary shavings system	S-4, secondary shavings system	S-5, transport system
Minimum Pressure Drop (in. H ₂ O)	0.4	0.4	0.1

For lower pressure drop reading(s) resulting from replacement of bags, the permittee shall record the deviation(s) as such in their daily records. Due allowance will be made for lower pressure drop reading(s) which follow replacement of bags provided the permittee establishes to the satisfaction of the Technical Secretary that these lower readings resulted from the replacement of bags.

If a pressure gauge reading falls below the minimum acceptable value and it is not due to the replacement of bags, the permittee shall provide relevant comments and any action taken shall be noted by the recorder in the daily log. These values shall be considered deviations. Any relevant comments may be included for consideration by the Division if readings are not typical.

Each cyclone shall be inspected weekly to see if there are any abrasion holes or leaks. If these conditions occur, they shall be repaired promptly. All plugging problems shall be remedied as soon as feasible.

A monthly log of maintenance, repair, and baghouse gauge readings shall be kept for the baghouses and cyclones. The logs shall indicate what maintenance and repair was done, when it was done, by whom, and when problems were rectified, showing time and date. This information shall include, but is not limited to, filter inspections, filter replacement, baghouse pressure drop readings, cyclone inspections, and time of use of the emergency/standby venting from fabric filters or cyclones. Bypass venting of the woodworking system's control equipment shall be noted as to duration and reason for venting. These logs shall be retained for a period of not less than five (5) years. Monthly log entries shall be reported in accordance with Condition **E2**.

The woodworking operation shall be monitored in accordance with the Compliance Assurance Monitoring Plan (Attachment 2) dated April 15, 2021, and approved by the Division. Log entries (or a summary thereof) shall be reported in accordance with Condition **E2**.

49-0068-05	<u>Source Description:</u>	Dip tank for applying wood preservatives on wooden door parts with no particulate emitted.
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Conditions E5-1 and E5-2 apply to source 49-0068-05 as indicated.

E5-1. Volatile organic compounds (VOC) emitted from this source shall not exceed 123 tons during any period of twelve (12) consecutive months.

TAPCR 1200-03-07-.07(2) and the signed agreement dated March 28, 2023.

Compliance Method: Compliance with this emission limitation shall be demonstrated by completing Logs 1 and 2 found in Condition **E3-3**. Records to establish the VOC content of each material, such as formulation data or MSD sheets, shall be maintained in accordance with Condition **E3-2**. The emission factor for evaporation of solvents has been established as 80% evaporation (this conservative value represents maximum VOC emissions and minimum VOC retention in the wood). This was established from a 1991 plant study, has been reviewed by the Division, and is acceptable for determining VOC emissions. Reports and certifications shall be submitted in accordance with Condition **E2** of this permit.

E5-2. Recordkeeping for gaseous HAP emissions shall be compiled using Logs 1 and 3 in Condition **E3-3**. This log shall be submitted in accordance with Condition **E2** of this permit.

TAPCR 1200-03-10-.02(2)(a)

Compliance Method: Included with the requirement.

49-0068-10	<u>Source Description:</u>	Primer (display unit) spray booth and spray booth sealer and finisher line for wooden doors and window parts with filter pad control for particulate. (this includes previous separate source 49-0068-21)
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Conditions E6-1 through E6-4 apply to source 49-0068-10 as indicated.

E6-1. Volatile organic compounds (VOC) emitted from this source shall not exceed 9.92 tons during any period of twelve (12) consecutive months.

TAPCR 1200-03-07-.07(2) and the signed agreement dated March 28, 2023.

Compliance Method: Compliance with this emission limitation shall be assured by completing Logs 1 and 2 contained in Condition **E3-3**. Reports and certifications shall be submitted in accordance with Condition **E2** of this permit.

E6-2. Recordkeeping for gaseous HAP emissions shall be compiled using Logs 1 and 3 in Condition **E3-3**. This log shall be submitted in accordance with Condition **E2** of this permit.

TAPCR 1200-03-10-.02(2)(a)

Compliance Method: Included with the requirement.

E6-3. Particulate matter emitted from this source shall not exceed 1.0 pound per hour.

TAPCR 1200-03-07-.01(5) and the permit application dated April 20, 2021.

Compliance Method: Compliance with this hourly emission limitation has been verified by calculation of the maximum worst case for particulate emissions released. This was established utilizing the control efficiency (94%) of the filter pads and the overspray (20%) of solids emitted at the maximum amount of coating usage.

The above coating operations use dry filters (filter pads) to control particulate emissions. The control efficiency of the dry filters and periodic replacement of the dry filters assure compliance with the particulate standard. No surface coating shall occur in any spray booth without using said controls. Dry filters shall be changed periodically as needed. A monthly log of each spray booth station or area shall be kept denoting the actual day(s) and time that the dry filters were replaced for specific booths. This log shall be kept and entries from the log shall be reported in accordance with Condition **E2**.

E6-4. Visible emissions from this source shall not exhibit greater than ten percent (10%) opacity, except for one (1) six-minute period in any one (1) hour period, and for no more than four (4) six-minute periods in any twenty-four (24) hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

TAPCR 1200-03-05-.01(3); application dated April 20, 2021

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996, and amended September 11, 2013, (**Attachment 1**).

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements

49-0068-17	<u>Source Description:</u>	Fan coating for primer and enamel for wood bead glazing with no stack exhaust and with no particulate matter emitted.
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Conditions **E7-1** and **E7-2** apply to source 49-0068-17 as indicated.

E7-1. Volatile organic compounds (VOC) emitted from this source shall not exceed 4.05 tons during any period of twelve (12) consecutive months.

TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance with this emission limitation shall be assured by completing Logs 1 and 2 contained in Condition **E3-3**. Reports and certifications shall be submitted in accordance with Condition **E2** of this permit.

E7-2. Recordkeeping for gaseous HAP emissions shall be compiled using Logs 1 and 3 in Condition **E3-3**. This log shall be submitted in accordance with Condition **E2** of this permit.

TAPCR 1200-03-10-.02(2)(a)

Compliance Method: Included with the requirement.

49-0068-18	<u>Source Description:</u>	Assembly operations (K) including glass cleaning, sealant application such as silicone caulks, hand painting and spot priming, and four spray booths equipped with filter pad control for particulate emissions.
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Conditions **E8-1** through **E8-3** apply to source 49-0068-18 as indicated.

E8-1. Volatile organic compounds (VOC) emitted from this source shall not exceed 29.5 tons during any period of twelve (12) consecutive months.

TAPCR 1200-03-07-.07(2) and the maximum emissions/usage as stipulated in the Title V application dated April 20, 2021

Compliance Method: Compliance with this emission limitation shall be demonstrated by completing Logs 1 and 2 contained in Condition **E3-3**. Reports and certifications shall be submitted in accordance with Condition **E2** of this permit.

E8-2. Recordkeeping for gaseous HAP emissions shall be compiled using Logs 1 and 3 in Condition **E3-3**. This log shall be submitted in accordance with Condition **E2** of this permit.

TAPCR 1200-03-10-.02(2)(a)

Compliance Method: Included with the requirement.

- E8-3.** Particulate matter emitted from the spray booths shall not exceed 0.02 grain per dry standard cubic foot of exhaust gas (6.62 pounds per hour).

TAPCR 1200-03-07-.04(1)

Compliance Method: Compliance with this hourly emission limitation has been verified by calculation of the maximum worst case for particulate emissions released. This was established utilizing the control efficiency (94%) of the filter pads and the overspray (20%) of solids emitted at the maximum amount of coating usage.

The above spray coating operations use dry filters (filter pads) to control particulate emissions. The control efficiency of the dry filters and periodic replacement of the dry filters assure compliance with the particulate standard. No surface coating shall occur in any spray booth without using said controls. Dry filters shall be changed periodically as needed. A monthly log of each spray booth station or area shall be kept denoting the actual day(s) and time that the dry filters were replaced for specific booths. This log shall be kept and entries from the log shall be reported in accordance with Condition **E2**.

49-0068-19	Source Description:	Gluing operations (J), including 2-part catalyst mix, fingerjoint, edge gluing, extruder, and veneering with no stack exhaust and no particulate emitted.
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Conditions E9-1 and E9-2 apply to source 49-0068-19 as indicated.

- E9-1.** Volatile organic compounds (VOC) emitted from this source shall not exceed 5.0 tons during any period of twelve (12) consecutive months.

TAPCR 1200-03-07-.07(2) and the maximum emissions/usage as stipulated in the Title V application dated April 20, 2021.

Compliance Method: Compliance with this emission limitation shall be demonstrated by completing Logs 1 and 2 contained in Condition **E3-3**. Reports and certifications shall be submitted in accordance with Condition **E2** of this permit.

- E9-2.** Recordkeeping for gaseous HAP emissions shall be compiled using Logs 1 and 3 in Condition **E3-3**. This log shall be submitted in accordance with Condition **E2** of this permit.

TAPCR 1200-03-10-.02(2)(a)

Compliance Method: Included with the requirement.

49-0068-20	Source Description:	Custom color paint line for coating of aluminum extrusions includes: paint booth utilizing compliant spray guns, filter pads for control of particulate emissions, and curing oven.
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Conditions E10-1 through E10-8 apply to source 49-0068-20 as indicated.

- E10-1.** This source is subject to National Emissions Standards for Hazardous Air Pollutants (NESHAPS), 40 CFR Part 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. This is an existing area source since construction commenced before September 17, 2007, as defined in §63.11171 for performing spray application of coatings that contain chromium, the target HAP, as defined in §63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in §63.11180. Additionally, the permittee indicated in a letter dated October 4, 2010, that they do not engage in paint stripping operations or spray coatings to motor vehicles. Should this change, the permittee needs to review subpart HHHHHH for those applicable standards as they relate to paint stripping operations or spray coatings to motor vehicles and submit a minor permit modification application to the Division prior to this change as required by 1200-03-09-.02(11)(f) of the Tennessee Air Pollution Control Regulations.

Pursuant to 40 CFR 63.11171 and 40 CFR 63.11180

Compliance Method: None. This condition identifies that this facility is subject to 40 CFR part 63 subpart HHHHHH.

- E10-2.** For each miscellaneous surface coating operation, the permittee must meet the following requirements:

(1) All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (6) of this condition. The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in paragraph (6) of this condition. The requirements of this paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this paragraph.

(2) All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of paragraph (a) and (b) below.

(a) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see §63.14 of subpart A of this part). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to water-wash spray booths that are operated and maintained according to the manufacturer's specifications.

(b) Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.

(3) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002" (incorporated by reference, see §63.14 of subpart A of this part).

(4) All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.

(5) As provided in 40 CFR 63.6(g), the U.S. Environmental Protection Agency, may choose to grant the permittee permission to use an alternative to the emission standards in this section after the permittee has requested approval to do so according to §63.6(g)(2).

(6) The permittee must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by paragraph (1) of this condition. The training program must include, at a minimum, the items listed in paragraphs (a), (b), and (c) below.

(a) A list of all current personnel by name and job description who are required to be trained;

(b) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (i) through (iv) below.

(i) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.

(ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.

(iii) Routine spray booth and filter maintenance, including filter selection and installation.

(iv) Environmental compliance with the requirements of this subpart.

(c) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. The permittee who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (6)(b) of this condition are not required to provide the initial training required by that paragraph to these painters.

(7) As required by paragraph (1) of this condition, all new and existing personnel at a miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained by the dates specified in paragraph (a) below. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

(a) For an existing source, all personnel must be trained and certified no later than 180 days after hiring or no later than January 10, 2011, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (6)(b) of this condition satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

(b) Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.

Pursuant to 40 CFR 63.11173

Compliance Method: Compliance shall be assured by completing the requirements as described.

E10-3. Table 1 below of subpart HHHHHH shows which parts of the General Provisions in subpart A apply to the permittee.

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§63.1(a)(1)–(12)	General Applicability	Yes	
§63.1(b)(1)–(3)	Initial Applicability Determination	Yes	Applicability of subpart HHHHHH is also specified in §63.11170.
§63.1(c)(1)	Applicability After Standard Established	Yes	
§63.1(c)(2)	Applicability of Permit Program for Area Sources	Yes	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§63.1(c)(5)	Notifications	Yes	
§63.1(e)	Applicability of Permit Program to Major Sources Before Relevant Standard is Set	No	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§63.2	Definitions	Yes	Additional definitions are specified in §63.11180.
§63.3(a)–(c)	Units and Abbreviations	Yes	
§63.4(a)(1)–(5)	Prohibited Activities	Yes	
§63.4(b)–(c)	Circumvention/Fragmentation	Yes	
§63.5	Construction/Reconstruction of major sources	No	Subpart HHHHHH applies only to area sources.
§63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	Yes	

§63.6(b)(1)–(7)	Compliance Dates for New and Reconstructed Sources	Yes	§63.11172 specifies the compliance dates.
§63.6(c)(1)–(5)	Compliance Dates for Existing Sources	Yes	§63.11172 specifies the compliance dates.
§63.6(e)(1)–(2)	Operation and Maintenance	Yes	
§63.6(e)(3)	Startup, Shutdown, and Malfunction Plan	No	No startup, shutdown, and malfunction plan is required by subpart HHHHHH.
§63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	Yes	
§63.6(f)(2)–(3)	Methods for Determining Compliance	Yes	
§63.6(g)(1)–(3)	Use of an Alternative Standard	Yes	
§63.6(h)	Compliance With Opacity/Visible Emission Standards	No	Subpart HHHHHH does not establish opacity or visible emission standards.
§63.6(i)(1)–(16)	Extension of Compliance	Yes	
§63.6(j)	Presidential Compliance Exemption	Yes	
§63.7	Performance Testing Requirements	No	No performance testing is required by subpart HHHHHH.
§63.8	Monitoring Requirements	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§63.9(a)–(d)	Notification Requirements	Yes	§63.11175 specifies notification requirements.
§63.9(e)	Notification of Performance Test	No	Subpart HHHHHH does not require performance tests.
§63.9(f)	Notification of Visible Emissions/Opaity Test	No	Subpart HHHHHH does not have opacity or visible emission standards.
§63.9(g)	Additional Notifications When Using CMS	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§63.9(h)	Notification of Compliance Status	No	§63.11175 specifies the dates and required content for submitting the notification of compliance status.
§63.9(i)	Adjustment of Submittal Deadlines	Yes	
§63.9(j)	Change in Previous Information	Yes	§63.11176(a) specifies the dates for submitting the notification of changes report.
§63.10(a)	Recordkeeping/Reporting—Applicability and General Information	Yes	
§63.10(b)(1)	General Recordkeeping Requirements	Yes	Additional requirements are specified in §63.11177.
§63.10(b)(2)(i)–(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS	No	Subpart HHHHHH does not require startup, shutdown, and malfunction plans, or CMS.
§63.10(b)(2)(xii)	Waiver of recordkeeping requirements	Yes	
§63.10(b)(2)(xiii)	Alternatives to the relative accuracy test	No	Subpart HHHHHH does not require the use of CEMS.
§63.10(b)(2)(xiv)	Records supporting notifications	Yes	
§63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	

§63.10(c)	Additional Recordkeeping Requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§63.10(d)(1)	General Reporting Requirements	Yes	Additional requirements are specified in §63.11176.
§63.10(d)(2)–(3)	Report of Performance Test Results, and Opacity or Visible Emissions Observations	No	Subpart HHHHHH does not require performance tests, or opacity or visible emissions observations.
§63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	Yes	
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	No	Subpart HHHHHH does not require startup, shutdown, and malfunction reports.
§63.10(e)	Additional Reporting requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§63.10(f)	Recordkeeping/Reporting Waiver	Yes	
§63.11	Control Device Requirements/Flares	No	Subpart HHHHHH does not require the use of flares.
§63.12	State Authority and Delegations	Yes	
§63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	Yes	
§63.14	Incorporation by Reference	Yes	Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in §63.11173(e)(2) and (3) are incorporated and included in §63.14.
§63.15	Availability of Information/Confidentiality	Yes	
§63.16(a)	Performance Track Provisions—reduced reporting	Yes	
§63.16(b)–(c)	Performance Track Provisions—reduced reporting	No	Subpart HHHHHH does not establish numerical emission limits.

Pursuant to 40 CFR 63.11174

Compliance Method: Compliance shall be assured by following the applicability of the General Provisions in subpart A as they apply to the permittee.

E10-4. Annual Notification of Changes Report. The permittee is required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in Condition **E10-2** on the date of the report will be deemed to be a change. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (1) and (2) below.

(1) The permittee's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

(2) The name, title, address, telephone, e-mail address (if available) and signature of the permittee's certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart, or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.

Pursuant to 40 CFR 63.11176

Compliance Method: Compliance shall be assured by submitting the report (if applicable) as required in this condition to the following address:

Division of Air Pollution Control William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Avenue, 15th Floor Nashville, TN 37243 Or by email: Air.Pollution.Control@TN.gov	and	Air and EPCRA Enforcement Branch US EPA Region IV 61 Forsyth Street, SW Atlanta, Georgia 30303
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E10-5. The permittee must keep the records specified in paragraphs (1) through (7) below.

(1) Certification that each painter has completed the training specified in Condition **E10-2(6)** with the date the initial training and the most recent refresher training was completed.

(2) Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in Condition **E10-2(2)(a)**.

(4) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in Condition **E10-2(3)**.

(5) Copies of any notification submitted as required by §63.11175 and copies of any report submitted as required by Condition **E10-4**.

(6) Records of any deviation from the requirements in Conditions **E10-2**, **E10-3**, **E10-4** or §63.11175. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.

(7) Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

Pursuant to 40 CFR 63.11177 and 40 CFR 63.11178

Compliance Method: Compliance shall be assured by maintaining the records as described for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date and may be kept off-site after that two-year period.

E10-6. Volatile organic compounds (VOC) emitted from this source shall not exceed 23.0 tons during any period of twelve (12) consecutive months.

TAPCR 1200-03-07-.07(2) and the maximum emissions/usage as stipulated in the minor modification application dated February 20, 2006, and revised May 25, 2006

Compliance Method: Compliance with this emission limitation shall be demonstrated by completing Logs 1 and 2 in Condition **E3-3** of this permit. Reports and certifications shall be submitted in accordance with Condition **E2** of this permit.

E10-7. Recordkeeping for gaseous HAP emissions for compliance purposes shall be compiled using Logs 1 and 3 in Condition **E3-3** of this permit. This data shall also be included in Log 3 for facility-wide HAP information as specified in Condition **E3-3** of this permit. This log shall be submitted in accordance with Condition **E2** of this permit.

TAPCR 1200-03-10-.02(2)(a)

Compliance Method: Included with the requirement.

E10-8. Particulate matter emitted from the spray booth shall not exceed 0.02 grain per dry standard cubic foot of exhaust gas (2.16 pounds per hour). Particulate matter emitted from the spray booth shall not exceed 4.0 tons per year.

TAPCR 1200-03-07-.04(1) and the requested annual allowable particulate matter emission limitation as stipulated in the minor modification application dated February 20, 2006

Compliance Method: Compliance with these limitations has been verified by calculation of the maximum worst case for particulate emissions released. As required by Condition **E10-2(2)(a)** and §63.11173(e)(2)(i), the permittee must maintain at least a 98% capture efficiency of paint overspray, thereby assuring compliance.

This was established utilizing the control efficiency (94%) of the filter pads and the overspray (20%) of solids emitted at the maximum amount of coating usage.

The above spray coating operation uses dry filters (filter pads) to control particulate emissions. The control efficiency of the dry filters and periodic replacement of the dry filters assure compliance with the particulate standard. No surface coating shall occur in this spray booth without using said controls. Dry filters shall be changed periodically as needed. A monthly log shall be kept denoting the actual day(s) and time that the dry filters were replaced for this booth. This log shall be kept and entries (or a summary thereof) from the log shall be reported in accordance with Condition **E2**.

49-0068-22	<u>Source Description:</u>	Wood working operations #2 with CNC machines, shapers, saws, and disk sanders with dust collection using fabric filter control. Emission points: Fabric filter #6 (exhaust returned into the building with emergency/bypass venting capability if needed). (CAM Plan – Attachment 2)
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Conditions **E11-1** and **E11-2** apply to source 49-0068-22 as indicated.

E11-1. Maximum rate of wood waste collected shall not exceed 250 pounds per hour, on a daily average basis. If this capacity is exceeded, a permit modification or construction permit will be required.

Compliance Method: The Technical Secretary may require permittee to demonstrate compliance with this rate.

E11-2. Particulate matter emitted from this source shall not exceed 1.0 pounds per hour. This corresponds to 4.38 tons per year.

TAPCR 1200-03-07-.03(1) and 1200-03-10-.02(2)(a)

Compliance Method: Compliance with the particulate emission limitation shall be assured by monitoring and recording the following:

A daily log of fabric filter pressure drop readings shall be kept. A minimum of one reading per day shall be taken when the dust collection system is in operation. The days when the source does not operate shall be noted. The minimum acceptable pressure drop readings of the fabric filter pressure gauge shall be as follows:

Pressure Gauge Number	6
Fabric Filter	primary shavings system
Minimum Pressure Drop (in. H ₂ O)	0.05

For lower pressure drop reading(s) resulting from replacement of bags, the permittee shall record the deviation(s) as such in their daily records. Due allowance will be made for lower pressure drop reading(s) which follow replacement of bags provided the permittee establishes to the satisfaction of the Technical Secretary that these lower readings resulted from the replacement of bags.

If a pressure gauge reading falls below the minimum acceptable value and it is not due to the replacement of bags, the permittee shall provide relevant comments and any action taken shall be noted by the recorder in the daily log. These values shall be considered deviations. Any relevant comments may be included for consideration by the Division if readings are not typical.

All plugging problems shall be remedied as soon as feasible.

A monthly log of maintenance, repair, and baghouse gauge readings shall be kept for the baghouse. The logs shall indicate what maintenance and repair was done, when it was done, by whom, and when problems were rectified, showing time and date. This information shall include, but is not limited to, filter inspections, filter replacement, baghouse pressure drop readings, and time of use of the emergency/standby venting from fabric filter. Bypass venting of the woodworking system's control equipment shall be noted as to duration and reason for venting. These logs shall be retained for a period of not less than five (5) years. Monthly log entries shall be reported semiannually and annually in accordance with Condition **E2**.

PROPOSED Permit Number: 579026

Expiration Date: TBD, 2028

The woodworking operation shall be monitored in accordance with the Compliance Assurance Monitoring Plan (Attachment 2) dated April 15, 2021, and approved by the Division. Log entries (or a summary thereof) shall be reported in accordance with Condition **E2**.

END OF PROPOSED PERMIT NUMBER 579026

ATTACHMENT 1

**OPACITY MATRIX DECISION TREE for
VISIBLE EMISSION EVALUATION METHOD 9
dated JUNE 18, 1996 and amended September 11, 2013**

Decision Tree PM for Opacity for Sources Utilizing EPA Method 9*

Notes:

PM = Periodic Monitoring required by 1200-03-09-.02(11)(e)(iii).

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emission standards set forth in the permit. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring – Proposed 40 CFR 64).

Examine each emission unit using this Decision Tree to determine the PM required.*

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing EPA Method 9. The observer must be properly certified to conduct valid evaluations.

Typical Pollutants

Particulates, VOC, CO, SO₂, NO_x, HCl, HF, HBr, Ammonia, and Methane.

Initial observations are to be repeated within 90 days of startup of a modified source, if a new construction permit is issued for modification of the source.

A VEE conducted by TAPCD personnel after the Title V permit is issued will also constitute an initial reading.

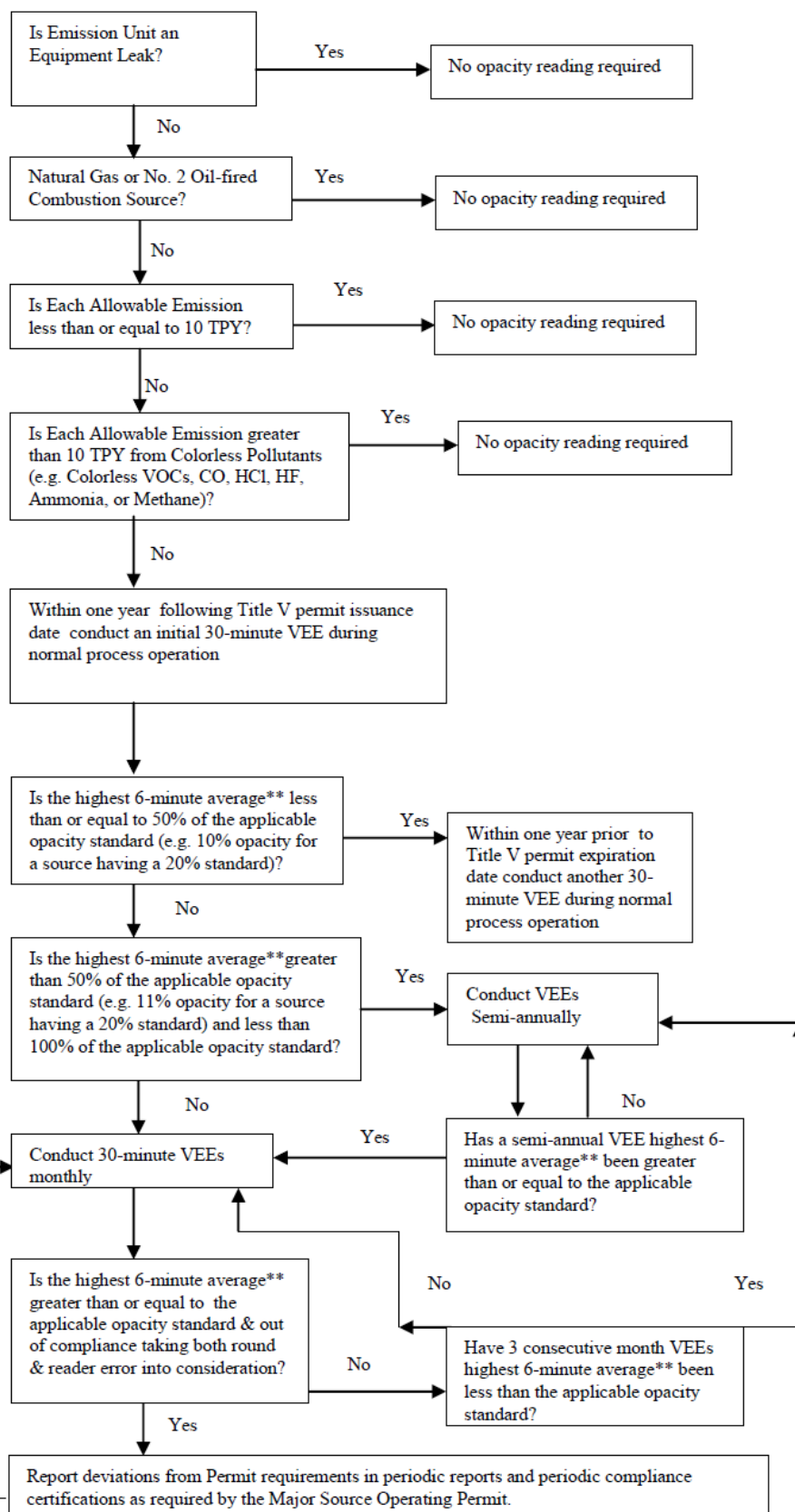
Reader Error

EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards: The TAPCD guidance is to declare non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

EPA Method 9, NSPS or NESHAPS stipulate opacity standards: EPA guidance is to allow only engineering round. No allowance for reader error is given.

*Not applicable to Asbestos manufacturing subject to 40 CFR 61.142

**Or second highest six-minute average, if the source has an exemption period stipulated in either the regulations or in the permit.



Dated June 18, 1996
Amended September 11, 2013

ATTACHMENT 2

**COMPLIANCE ASSURANCE MONITORING (CAM) PLAN
FOR WOODWORKING OPERATIONS**


The following sources have control devices known as bag houses and cyclones.

49-0068-01 Source description – Wood working operations with wood dust collection from saws, molders, jointers, and wood hog with two load outs to trucks by bin and auger release using cyclones and fabric filters for particulate control. Shaving transport to storage silo (bag house bin vent) Emission points: Fabric filters #1, #2, #5, Cyclones S-1 and S-3 with emergency /bypass venting capability if needed.

49-0068-22 Source description-Wood working operations in preprocessing area consisting of CNC machines,shapers,saws and disk sanders using a baghouse and fabric filters for particulate control. Emission limit is 1.0 lb/hr and is assured by maintaining a minimum pressure drop of 0.05 in filter #6.

Emission limit of 8.15 lbs/hr for source 01 is assured by maintaining a minimum pressure drop of 0.4 in filter #1, 0.4 in filter #2 and 0.1 in filter #5 when the sources are operating .The pressure drops are being recorded daily and this information is submitted with the Semi-Annual Reports. If any of the control devices are found to be operating outside of the acceptable range, prompt corrective action will be taken. Should a blockage or major leak occur in a transfer pipe employees in the area and machine operators inside the facility should be aware of the problem within minutes due to the failure of the system to evacuate the dust. There is a large flashing red light on the control panel of the system that indicates failure of the system .When control equipment is found out of compliance maintenance will be notified via radio or verbally immediately . Work orders will be entered into the Computerized Maintenance Management System (CMMS) to document corrective actions to control equipment (made as soon as possible), not all work orders for control equipment indicate an out of compliance event. Explanation of any out of compliance equipment will be added to the daily pressure drop reading log.

04/15/2021



Michael Enoch

Plant Manager

Compliance Assurance Monitoring (CAM) Plan – 40 CFR 64

Marvin Windows and Doors of Tennessee
101 Marvin Road
Ripley, Tennessee, 38063

Stack or Flow Diagram Points	Bag house fabric filters S-2,S-4,S-5 Bag house fabric filter #6
Pollutants	Particulate matter
Indicator	Pressure Drop
Description of Monitoring Protocol	The pressure drop is measured by a gauge on each bag house filter
Indicator Range	An excursion is defined as any daily baghouse reading below <u>0.4 in. for gauge#1, 0.4 in. for gauge #2, & 0.1 in. for gauge #3. Baghouse #6 gage 0.05.</u> An excursion triggers a reporting requirement. Corrective action must be initiated when measured pressure drop falls below the permit requirement, excluding those events defined as startups, shutdowns, or malfunctions.
Data Representatives	Under normal operations some pressure gauge readings may be lower due to a bag change out , otherwise readings will increase with time as bags build up with material on their surface
Verification of Operational Status	The monitoring approach uses existing equipment.
Measurement Frequency	Baghouse pressure gauge readings are taken once daily while source is operating. Each cyclone will be inspected weekly to see if there are any abrasion holes or leaks A monthly log of maintenance, repair, and baghouse gauge readings will be kept for the baghouses and cyclones.
QA/QC Practices	Daily zero gauge prior to reading.
Reference	Title V Permit 562099, 49-0068-01, Wood Working Operations, Administrative amendment #1(4/27/15), Renewal application (6/30/15) permit 562099, 49-0068-22 added in minor mod #2.

ATTACHMENT 3

FORM APC 36



DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 DIVISION OF AIR POLLUTION CONTROL
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 15th Floor, Nashville, TN 37243
 Telephone: (615) 532-0554, Email: Air.Pollution.Control@TN.gov

APC 36

TITLE V FEE SELECTION

Type or print and submit to the email address above.			
FACILITY INFORMATION			
1. Organization's legal name and SOS control number [as registered with the TN Secretary of State (SOS)]			
2. Site name (if different from legal name)			
3. Site address (St./Rd./Hwy.)			County name
City			Zip code
4. Emission source reference number		5. Title V permit number	
FEE SELECTION			
This fee selection is effective beginning January 1, _____. When approved, this selection will be effective until a new Fee Selection form is submitted. Fee Selection forms must be submitted on or before December 31 of the annual accounting period.			
6. Payment Schedule (choose one):			
Calendar Year Basis (January 1 – December 31) <input type="checkbox"/>		Fiscal Year Basis (July 1 – June 30) <input type="checkbox"/>	
7. Payment Basis (choose one):			
Actual Emissions Basis <input type="checkbox"/> Allowable Emissions Basis <input type="checkbox"/> Combination of Actual and Allowable Emissions Basis <input type="checkbox"/>			
8. If Payment Basis is "Actual Emissions" or "Combination of Actual and Allowable Emissions", complete the following table for each permitted source and each pollutant for which fees are due for that source. See instructions for further details.			
Source ID	Pollutant	Allowable or Actual Emissions	If allowable emissions: Specify condition number and limit. If actual emissions: Describe calculation method and provide example. Provide condition number that specifies method, if applicable.

[illegible]

ATTACHMENT 4

FORM HHHHHH Annual Notification of Changes



(Sample) Tennessee Annual Notification of Changes

Paint Stripping and Miscellaneous Surface Coating Operations

Area Source NESHP

40 CFR 63, Subpart HHHHHH (6H) (Parts 63.11169-63.11180)

In the event there is a change at the business (including meeting rule requirements), an Annual Notification of Change must be submitted prior to March 1 of the year following the calendar year in which the changes or noncompliance occurred

➤ Identify the Type of Change Being Reported:

- ☐ Changes in Ownership /Address ☐ Changes in compliance in Rule requirements
☐ Changes in information previously submitted in Notifications / Reports ☐ Other changes

➤ Company Information:

If this is a change, check here ☐

Company Name _____ County _____

Type (please check) ☐ Fixed Location ☐ Mobile Operation(s) ☐ Combination of both types

Physical Location _____

City _____ State _____ Zip _____

Phone Number _____ Fax _____ E-mail _____

Mailing Address _____

City _____ State _____ Zip _____

Please provide address where records are kept if different from facility location above:

Address _____

City _____ State _____ Zip _____

➤ Compliance Certification Statement and Information:

If this is a change, check here ☐

- ☐ I certify the information provided in this notification is true, accurate, and complete to the best of my knowledge

Owner's Name _____

Mailing Address _____

City _____ State _____ Zip _____

Phone Number _____ Fax _____ E-mail _____

Owner's Signature _____ Date _____

▪ Operator / Other Official Information (if different from owner) (choose one): ☐ Operator ☐ Other

Name _____ Title _____

Mailing Address _____

City _____ State _____ Zip _____

Phone Number _____ Fax _____ E-mail _____

Official's Signature _____ Date _____

(Sample) Tennessee Annual Notification of Changes

Changes (C) Report

(skip item if there was no change)

➤ **Spray Painting**

C

- Required spray-painting operations are applied in a preparation station or spray booth

☐

The preparation station or spray booth are:

- Equipped with a full roof and required number of complete walls/curtains
- Spraying area has dry filters that demonstrates to achieve at least 98% capture of paint coating overspray or a waterwash system
- Spraying area is ventilated at either negative pressure, or at positive pressure of no more than 0.05 inches water gauge when the booth is sealed along with an automatic pressure balancing system
- Spray-applied coatings are applied with high-volume low-pressure (HVLV) spray guns, HVLV-equivalent technology, electrostatic application, airless spray gun, or air-assisted airless spray gun
- Spray guns are cleaned using non-atomizing methods
- Painters are trained and certified in the proper application of surface coatings

☐

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☐

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➤ **Methylene Chloride Paint Stripping**

- Used more than one ton in the previous year of paint strippers containing methylene chloride
- Developed and implemented written methylene chloride management plan by December 31 of that year

☐

☐

➤ **Notification, Reporting and Recordkeeping**

- Notification, Reporting and Recordkeeping information submitted and maintained as required

☐

➤ **Other Changes / Explanation of all Changes**

[If this includes another change, check here ☐

Please provide additional explanation of the non-compliance or changes here. In addition, describe any corrective actions being taken to achieve compliance (attach a separate sheet if necessary).

_____ Year of Change / Non-Compliance

Submit the information to BOTH of the following addresses

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
ATTN: Paint and Allied Products Contact
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, Tennessee 37243

EPA Region IV
Director, Air, Pesticides and Toxics Management Div
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-3104

**Note: Keep a copy (in paper or electronic files) of all records including this notification for 5 years
(on site for 2 years)**

For assistance in completing the form or understanding the requirements: Call **1-800-734-3619**
This is the number for the Small Business Environmental Assistance Program's hotline.
It is a *confidential* assistance program for small businesses

Tennessee Small Business Environmental Assistance Program
E-mail: BGSBEAP@tn.gov

Hotline: 1-800-734-3619
Page 2

ATTACHMENT 5

Sources 05 and 10 VOC Agreement Letter



March 28, 2023

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

RE: Permit Agreement Letter
Marvin Windows & Doors of Tennessee
101 Marvin Road, Ripley, TN 38063
Emission Source Reference No. 49-0068 / Permit No. 570323

Dear Technical Secretary:

On behalf of Marvin Windows & Doors of Tennessee, the following limitations are agreed upon for the above referenced facility:

Volatile organic compounds (VOC) emitted by source 49-0068-05 shall not exceed 123.0 tons during any period of 12 consecutive months.

- Marvin Windows & Doors of Tennessee shall demonstrate compliance with these limitations by completing Logs 1 and 2 four and Condition E3-3.

Volatile organic compounds (VOC) emitted by source 49-0068-10 shall not exceed 9.92 tons during any period of 12 consecutive months.

- Marvin Windows & Doors of Tennessee shall demonstrate compliance with these limitations by completing Logs 1 and 2 four and Condition E3-3.

Should you have any questions or require additional information, please contact Jay Caldwell via phone at 731-635-6431 or via e-mail at r_josephc@marvin.com.

On behalf of Marvin Windows & Doors of Tennessee, I agree to the above limitations. I am authorized to represent and bind the facility in environmental affairs.

Signature

Name (Printed)

JAME Schilling

Title

Plant Manager

Date

3/28/23